

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID J. CATANZARO,	:	Civil Case No. 3:22-CV-01754-
	:	JFS-PJC
Plaintiff	:	(Judge Joseph F. Saporito Jr.)
	:	(Referred to Judge Phillip J.
v.	:	Caraballo)
	:	
LYKART TECHNOLOGIES LLC,	:	
ET AL.,	:	
	:	
Defendants.	:	
	:	

**DECLARATION OF MATT CURRIE IN SUPPORT OF APPLE'S
MOTION TO DISMISS FOR IMPROPER VENUE**

I, Matt Currie, declare as follows:

1. I am over the age of 18 and am competent to make this declaration. I provide this declaration in support of Apple Inc.'s ("Apple") motion to dismiss for improper venue filed in the above-captioned case. Unless I state otherwise, the facts in this declaration are based on my personal knowledge and experience as an Apple employee. If called to testify as a witness in this matter, I could and would testify truthfully to each of the facts set forth below.

2. I am a Senior Director on the Real Estate Legal team. I have worked at Apple since December 2007. As a result of my work at Apple, I am knowledgeable about the locations of Apple's retail stores and offices.

3. Apple was incorporated in California in 1977.

4. Apple has a principal place of business at One Apple Park Way, Cupertino, CA 95014.

5. The “Find a Store” option on Apple.com lists the following retail stores in Pennsylvania:

- Ardmore, Suburban Square, 61 St. James Place, Ardmore, PA 19003;
- King of Prussia, King of Prussia, 160 N. Gulph Road, King of Prussia, PA, 19406;
- Lancaster, Park City, 541 Park City Center, Lancaster, PA 17601;
- Philadelphia, Walnut Street, 1607 Walnut Street, Philadelphia, PA 19103;
- Pittsburgh, Ross Park, 1000 Ross Park Mall Drive, Pittsburgh, PA 15237;
- Pittsburgh, Shadyside, 5508 Walnut Street, Pittsburgh, PA 15232;
- Pittsburgh, South Hills Village, 301 South Hills Village, Pittsburgh, PA 15241;
- Whitehall, Lehigh Valley, 942 Lehigh Lifestyle Center, Whitehall, PA, 18052;
- Willow Grove, Willow Grove Park, 2500 West Moreland Road, Willow Grove, PA 19090.

I understand that these retail stores are not located in the Middle District of Pennsylvania based on the map found at

https://www.pamd.uscourts.gov/sites/pamd/files/MDPA_counties-map.png.

6. Based on my investigation, Apple currently has one corporate office in Pittsburgh, Pennsylvania, which I understand is not in the Middle District of Pennsylvania based on the map found at

https://www.pamd.uscourts.gov/sites/pamd/files/MDPA_counties-map.png.

7. Based on my investigation, as of March 17, 2025, Apple does not own or lease any office space, retail space, or other real property in the Middle District of Pennsylvania based on the map found at

https://www.pamd.uscourts.gov/sites/pamd/files/MDPA_counties-map.png.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 12th day of June, 2025, in Cupertino, California.

Matt Currie

Matt Currie